

March 8, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Structure and Practices of the Video Relay Service Program, Further Notice of
Proposed Rulemaking, CG Docket Nos. 10-51, 03-123, FCC 11-184 (rel. Dec. 15, 2011)

Dear Ms. Dortch,

Absurd ! It appears the FCC comment initiative for input from the "public" on/for the above matter has taken one step forward and two steps back !

You've heard the expression, "fallen on Deaf ears" ?

Unfortunately, it best describes the solicited comment dialogue regarding this FNPRM of the VRS program from its current subscribers as well as those whom are not aware of this eventful process/procedure.

Upon my review of submitted comments on this important matter, I see there is a minuscule amount, i.e. "a drop in the bucket" of input from the vitally important component that matters the most.

That being the few (relatively speaking) of Deaf and Hard of Hearing (HoH) consumers who do and the significant amount (...in the MILLIONS) who have YET to utilize the VRS network.

This is key and an overlooked dynamic in this equation of "functional equivalence" that has seemingly been obscured if not negated by the FNPRM for an understanding for what's at stake here for its users.

If I may take this opportunity to explain, this is overtly obvious in two ways.

1) The Deaf who DO NOT have an "effective" understanding of what is being communicated in the 109 pages of the FNPRM (one could argue is a blatant ADA violation) where American Sign Language (ASL) is the preferred mode of communication. This is truly ironic, if not derogatory that the VRS system was created to replace the obsolete, outdated and despised TEXT relay of the TTY in

favor of VRS, the real preference of ASL for communication for the Deaf/HoH.

To clarify this point, I refer you to a excerpt of a comment on this FNPRM from Mr. Sean Gerlis, a described VRS consumer. (February 24, page 7 # II)_? A large percentage of VRS consumers are not fluent in written English.?

2) Those of the Deaf / HoH population who are currently prohibited to benefit from this marvelous technological advancement of communication by denial of access to BROADBAND.

To clarify this point, I refer you to the FCC acknowledged dilemma addressed in WC Docket No. 10-90; A National Broadband Plan for Our Future

I feel it is imperative to accurately garnish feedback from the ?few? Deaf/HoH who currently utilize VRS and the MILLIONS more of potential VRS consumers who have yet to benefit from its existence.

The FNPRM needs to be done in whole or summary in ASL with captions to counter the sentiment as expressed by Mr. Sean Gerlis regarding the FNPRM content delivery in exclusive English text.

To help accomplish this, support for the formation of the ?blue ribbon? advisory committee mentioned in another comment (10-51_March 6, Joint VRS providers_p.2) in this FNPRM to initiate outreach and address VRS issues which will increase awareness and subscribers who are ENTITLED to access the VRS network and will provide ongoing information, updates with the VRS program and therefore should be required to be broadcast through ALL VRS providers network systems and websites on a regular basis and/or as needed for maximum exposure to the Deaf/HoH community.

This ?blue ribbon? committee should be compromised of a 51% Deaf/HoH majority.

In addition, the FCC should establish and maintain a VRS awareness PR campaign for the hearing entities at large as well and broadcast on mainstream media for maximum exposure.

Also on the Commission?s proposal to replace the current tiered, per-minute model with a per-user compensation model, and with all due respect Ms. Dortch, if you were to approach AT&T and/or any other Telecom provider with a ?flat-rate? per-user compensation model, they would wonder if you?re serious and quite possibly laugh at such a proposal.

To my knowledge and with fairness in mind, that industry is under the purview of the FCC and is not immune to fraud, waste or abuse.

While it is understood and commendable that the FCC must address and eliminate fraud and abuse in the VRS market, at this time, lets reflect upon another well known expression, ?haste makes waste.?

I look forward to the Commission taking thorough consideration of the varied aspects of the comments that have been submitted to date with hopes that another FNPRM might be necessary with a more complete comment investment with respect to this matter.

With Kind Regards and Respectfully submitted,

Michael Doyle